FILED
JUN - 7 2017
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
JERAMY WEGMAN,) **4:17CR00261 AGF/SPM**
)
Defendant.)

INDICTMENT

COUNT I

Introduction

1. At all relevant times, the John Cochran St. Louis VA Medical Center (the "facility") was a health care facility located in the City of St. Louis, Missouri. The facility provides health care services to veterans and other beneficiaries through the United States Department of Veterans Affairs.

2. At all relevant times, the HVAC shop was a department of the facility and had responsibility for maintenance of HVAC systems at the facility.

3. At all relevant times, Tony Pedretti was the HVAC shop foreman at the facility.

4. From on or about February 1, 2014 through on or about April 30, 2015, Defendant Jeramy Wegman was an outside contractor doing business with the United States at the facility. Between February 1, 2014 and April 30, 2015, Defendant Jeramy Wegman earned $181,673.93 contracting at the facility.

The Conspiracy

5. It was the object of the conspiracy for Pedretti to trade on his ability to bind the VA to contracts without supervisory approval via a government credit card for matters of less than

$2,500.

6. It was a manner and means of the conspiracy for Pedretti to engage in numerous contracts for work at the facility for amounts just under his $2,500 sole contracting authority limit.

7. It was a manner and means of the conspiracy for Defendant Wegman, while acting as the outside VA contractor, to kick back a portion of his contracts in cash to Pedretti. Typically, Defendant Wegman would kick back $1,500 in cash to Pedretti for every two contracts, which totaled just less than $5,000. About half of the work for which Wegman was compensated was actually completed and about half of the work was not. This "ghost work" provided extra funds from which Defendant Wegman paid Pedretti his kickbacks.

Offense Conduct

8. Between on or about February 1, 2014 and continuing through on or about April 30, 2015, in the Eastern District of Missouri and elsewhere, the defendant,

JERAMY WEGMAN,

did knowingly and intentionally combine, conspire, confederate and agree with one or more others to commit an offense against the United States, to wit: theft of government funds in violation of 18 United States Code Section 641 and, during the existence of the conspiracy, one or more parties to the conspiracy committed an overt act in furtherance and execution thereof.

All in violation of Title 18, United States Code Section 371.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 371 as set forth in Count 1, the defendant(s) shall forfeit to the United States of

America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation(s).

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation(s).

3. If any of the property described above, as a result of any act or omission of the defendant(s):

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty, the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

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FOREPERSON

Respectfully submitted,

CARRIE COSTANTIN
Acting United States Attorney

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Thomas C. Albus, #46224MO
Assistant United States Attorney